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NAME OF COMMITTEE (In Full)  
Chubb Group Holdings Inc. Legacy Political Action Committee

FEC IDENTIFICATION NUMBER  
C00229203

Mailing Address 15 Mountain View Road

City	State	ZIP Code
Warren	NJ	07059

FEC Form 99, to accompany The Chubb Group Holdings Inc. Legacy Political Action Committee October 2016 12G Filing: This FEC Form 99 is submitted in conjunction with the 2016 12G filing for the Chubb Group Holdings Inc. Legacy Political Action Committee (Legacy ChubbPAC). As an initial matter, this report, due on October 27, 2016 is being filed late, due to clerical oversight, which we realized on November 1 when we sought to generate our M11 report, covering October. We regret this error and have sought to correct it in the timeliest manner possible; we ask that the Commission accept this filing out of time, the first such late filing for Legacy ChubbPAC in its 28-year history. Further, we ask the Commissions consideration of the following request to correct a further complication regarding this report, which we outline as follows: Upon realizing our deadline oversight on November 1, we immediately populated the 12G filing through VOCUS, the PAC database vendor that we have used for a number of years to manage our PAC finances and FEC reports. That draft 12G report, however, contained a discrepancy of \$38.48 between the amount shown in Line 8 as Cash on Hand at the Close of the Reporting Period (<-\$38.48>) and the amount in the VOCUS database (\$0) (as well as in our bank records, also \$0). Legacy ChubbPAC has a zero bank account balance in anticipation of being terminated, due to the acquisition of The Chubb Corporation by ACE Ltd. in January 2016. In preparation for filing our termination report, Legacy ChubbPAC transferred all of its remaining funds -- \$110,696.37 -- to the successor company PAC, Chubb Group Holdings Inc. Political Action Committee (New ChubbPAC) on October 12, 2016. The FEC report, however, indicates that the PACs total cash on hand, prior to disbursements, at the end of this reporting period was \$110,657.89, or \$38.48 less than the amount in our records in VOCUS and in our bank records. We have researched this discrepancy in several ways both through the VOCUS database and by comparing our bank statements with our FEC reports for the past three years.

We reconcile our bank statements with VOCUS each month and have never had a discrepancy of any amount between those two records. To research the possible origins and cause of the \$38.48 discrepancy, we first queried the VOCUS database for any receipt in the amount of \$38.48. That query produced no record of a receipt in that amount. We then compared our bank statements to our FEC reports for each month, going back to September 2013. That research revealed that the \$38.48 discrepancy between our FEC reports and our records has existed undetected, for more than three years, with our bank and VOCUS records reflecting \$38.48 more in cash on hand than the cash on hand amount that was ceded into our FEC reports through VOCUS. We do not have an explanation for this discrepancy. We know that its origins were prior to 2014 and that due to the peculiar way in which it occurred (as a discrepancy between the FEC report and the information in the VOCUS database), it seems most likely to be an error that occurred when information was ceded from the VOCUS database into the FEC reports we generated through VOCUS. We are confident that the discrepancy was not between our bank records and VOCUS, as those records are reconciled monthly. Because the VOCUS database reconciled with our bank records each and every month, we had no reason to believe that there could be any variance in the data drawn from VOCUS that populated our FEC reports. Indeed, while there is a discrepancy, we believe that the error occurred more than three years ago and possibly occurred in the download of information from VOCUS into the FEC form. We ask that the Commission accept this 12G filing and in light of the de minimus amount at issue and our inability to determine where or when within the report generation process the error occurred, that we be

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permitted to amend the Legacy ChubbPAC 2016 12G filing to reflect the accurate amount of \$110,696.37 as the Cash on Hand at the Beginning of the Reporting Period (line 6(a)). We thank the Commission for its consideration of this request.